

## KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

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September 15, 2014

## BY ECF & E-MAIL

The Honorable Valerie E. Caproni United States District Court Southern District of New York 40 Foley Square New York, New York 10007 Phone: (212) 805-6350 SO ORDERED.

HON. VALERIE CAPRONI UNITED STATES DISTRICT JUDGE

Date: September 19, 2014

Re: Maya Hayuk v. Coach Services, Inc., No. 14-CV-06668 (VEC) (S.D.N.Y.)

Dear Judge Caproni:

We represent defendants Coach Services, Inc. and Midley, Inc. in the above-referenced action and write on behalf of all parties. Pursuant to Rule 1(E) of Your Honor's Rules of Individual Practice, the parties write to respectfully request that Your Honor "so order" the attached Stipulation and Order, which the parties have fully executed, extending defendants' time to respond to plaintiff's complaint. The parties further request, pursuant to Rule 1(C) of Your Honor's rules, an extension or adjournment of each of the items set forth in the Court's August 25, 2014 Notice of Initial Pretrial Conference ("the Notice")-namely, an adjournment of the pretrial scheduling conference (the "Conference"), an extension of time to submit the joint letter described in paragraph 3 of the Notice (the "Joint Letter"), and an extension of time to submit a case management plan and scheduling order (the "Plan").

The parties are jointly seeking these extensions so that ongoing settlement negotiations of this dispute can be further pursued. This is the first request for extension the parties have sought as to any of these deadlines or the Conference date.

Defendants' response to plaintiff's complaint is currently due September 19, 2014; the attached stipulation would extend that deadline to October 20, 2014. The parties are also requesting an extension or adjournment of each the items addressed by the Notice. The Conference is currently scheduled for October 2, 2014 at 10:00 a.m., and the parties' deadline for submitting both the Joint Letter and the Plan is September 24, 2014. The parties are requesting that the Conference be adjourned to November 7, 2014, or as soon thereafter as the parties can be heard, and that the deadline for the parties to submit the Joint Letter and Plan be extended to October 24, 2014.

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Kasowitz, Benson, Torres & Friedman LLP

Dated: September 15, 2014

Respectfully Submitted

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

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Attorneys for Defendants Coach Services, Inc. and Midley, Inc.

cc: Counsel of Record (via ECF)